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10 *Individual dba Ponderosa Saloon,*

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

11 BROADCAST MUSIC, INC.; HOUSE OF  
12 CASH, INC.; PEERMUSIC III LTD.; RIO  
13 BRAVO MUSIC, INC.; and RONDOR MUSIC  
14 INTERNATIONAL, INC., d/b/a IRVING  
15 MUSIC,

16 Plaintiffs,

17 vs.

18 CHERRIE BAILEY, an individual d/b/a  
19 PONDEROSA SALOON,

20 Defendant.  
21 \_\_\_\_\_/

3:22-cv-00157-MMD-CSD

STIPULATION FOR EXTENSION  
OF TIME TO RESPOND TO  
COMPLAINT

(FIRST REQUEST)

22 IT IS HEREBY STIPULATED, by and between Plaintiffs BROADCAST MUSIC, INC.;  
23 HOUSE OF CASH, INC.; PEERMUSIC III LTD.; RIO BRAVO MUSIC, INC.; and RONDOR  
24 MUSIC INTERNATIONAL, INC., d/b/a IRVING MUSIC (collectively, "Plaintiffs"), by and through  
25 their counsel Michelle D. Alarie, Esq., Armstrong Teasdale, LLP., and by Defendant CHERRIE  
26 BAILEY, an individual d/b/a PONDEROSA SALOON ("Defendants"), by and through her counsel,  
27 Catherine A. Reichenberg, Esq., Gunderson Law Firm, that the time allowed for Defendants to respond  
28 to the Plaintiffs' Complaint shall be extended up to 45 days, ending on and including June 17, 2022.

1 The Complaint and Summons were served April 12, 2022. This request for an extension of  
2 time is made before the expiration of any deadline to answer or otherwise respond to the Complaint  
3 by the Defendant.

4 Good cause exists for this extension as the parties are engaged in early settlement discussions  
5 in an effort to resolve the matter short of further litigation. Accordingly, counsel for all parties agree  
6 to extend the time for the Defendants to answer or otherwise respond to the Complaint through June  
7 17, 2022.

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9 DATED this 26th day of April, 2022.

10 GUNDERSON LAW FIRM

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12 /s/ Catherine A. Reichenberg, Esq.  
13 GUNDERSON LAW FIRM  
14 Catherine A. Reichenberg, Esq.  
15 Nevada State Bar No.: 10362  
16 *Attorney for Cherrie Bailey, an individual*  
*d/b/a Ponderosa Saloon*

17 DATED this 26th day of April, 2022.

18 ARMSTRONG TEASDALE LLP

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21 /s/ Michelle D. Alarie, Esq.  
22 ARMSTRONG TEASDALE LLP  
23 Michelle D. Alarie, Esq.  
24 Nevada State Bar No.: 11894  
25 *Attorney for Broadcast Music, Inc., House of*  
*Cash, Inc., Peermusic III Ltd, Rio Bravo Music,*  
*Inc., and Rondor Music International, Inc., dba*  
*Irving Music*

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**ORDER EXTENDING TIME TO FILE RESPONSIVE PLEADING**

**IT IS HEREBY ORDERED** that the Stipulation is approved; and

**IT IS FURTHER ORDERED** that Defendants shall have up to and including June 17, 2022 to answer or otherwise respond to Plaintiffs' Complaint;

**IT IS ORDERED** this 27th day of April, 2022.



UNITED STATES MAGISTRATE JUDGE